

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

OREN ROSENSHINE
AMIR ROSENSHINE

Plaintiffs,

vs.

A. MESHI COSMETICS INDUSTRIES LTD., A TO
Z IMPORTS, INC. and EYAL NOACH

Defendants

18-cv-03572
(LDH-LB)

**DECLARATION OF ALLISON KHASKELIS
IN SUPPORT OF THE LOCAL RULE 56.1
STATEMENT SUBMITTED BY DEFENDANT
A. MESHI COSMETICS INDUSTRIES LTD.**

ALLISON KHASKELIS, an attorney duly admitted to practice law before this Court, declares the following:

1. I am an attorney at the law firm of Asserson Hiller P.C., counsel for A. Meshi Cosmetics Industries Ltd. ("Meshi"). I am fully familiar with the facts and circumstances set forth herein.
2. Attached are true and correct copies of the following documents:

Exhibit 1:

Declaration of Yermi Mizrahi dated June 3, 2019, submitted in support of Meshi's Motion to Dismiss (ECF No. 47-2);

Exhibit 2:

Meshi Corporate Structure Statement (Bates Number AMeshi_000023), produced to Plaintiffs on June 21, 2022;

Exhibit 3:

Screenshot of Global Manufacturing Import Export Inc.’s (“GMIE”) registration with the New York Department of State Division of Corporations, available at <https://apps.dos.ny.gov/publicInquiry/EntityDisplay> and last accessed on August 24, 2022;

Exhibit 4:

Meshi general ledger for 2012 (generated on February 23, 2022) demonstrating GMIE arrears for Star Gel purchased in the amount of \$1,967.64 that has never been paid (AMeshi_000004), produced to Plaintiffs on April 28, 2022;

Exhibit 5:

First Request for Production of Documents by Defendant A. Meshi Cosmetics Industries Ltd. Directed to Plaintiffs Oren and Amir Rosenshine Pursuant to Rule 34 of the Federal Rules of Civil Procedure, dated March 24, 2022 (ECF No. 82-1);

Exhibit 6:

Correspondence between the parties regarding discovery (ECF No. 82-2);

Exhibit 7:

Plaintiffs’ May 31, 2022 production of documents to Meshi (no Bates numbers on production), with summary table of the production prepared by counsel for Meshi

Exhibit 8:

Transcript of the June 8, 2022 Hearing before the Honorable Lois Bloom, certified on June 11, 2022 by Mary Greco of Transcriptions Plus II, Inc.;

Exhibit 9:

November 23, 2016 Meshi invoice to A to Z (Bates Number AMeshi_000001), produced to Plaintiffs on April 28, 2022;

Exhibit 10:

Plaintiffs’ disclosures produced to Meshi on December 14, 2020 (ECF No. 82-3);

Exhibit 11:

Meshi’s June 21, 2022 Offer of Judgment to the Plaintiffs with attendant correspondence.

Dated: August 30, 2022
New York, New York

Respectfully submitted,

/s/ Allison Khaskelis

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*Attorneys for Defendant
A. Meshi Cosmetics Industries Ltd.*